

Stephanie L. Silvano (NJ #168182016)  
GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue  
New York, NY 10166  
Tel.: 212.351.4000  
Fax: 212.351.4035  
ssilvano@gibsondunn.com

*Attorneys for Defendant BetMGM, LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: BETMGM DATA BREACH  
LITIGATION

Civil Action No. 22-7462-JXN-CLW

**CERTIFICATION OF WESLEY SZE**

I, Wesley Sze, of full age, hereby declare as follows:

1. I am an attorney licensed to practice in California with a primary office in Palo Alto, California. I am an attorney with the law firm Gibson, Dunn & Crutcher LLP, located at 1881 Page Mill Road, Palo Alto, CA 94304.
2. I make this declaration in support of this application to appear and participate *pro hac vice* in this matter on behalf of Defendant BetMGM, LLC.
3. I respectfully submit that for the reasons that follow, good cause exists to permit me to appear and participate *pro hac vice* in this matter.
4. I have represented Defendant from the outset of the present dispute. As

a consequence, Defendant has requested that I participate and represent it in this matter.

5. Since 2015, I have been a member in good standing of the bar of the State of California. The roll of members of the bar of the State of California is maintained by the State Bar of California, 180 Howard Street, San Francisco, CA 94105.

6. Since 2016, I have been a member in good standing of the bar of the United States District Court for the Northern District of California. The roll of members of the bar of the United States District Court for the Northern District of California is maintained by the Clerk of the Court, 450 Golden Gate Avenue, San Francisco, CA 94102.

7. Since 2018, I have been a member in good standing of the bar of the United States District Court for the Southern District of California. The roll of members of the bar of the United States District Court for the Southern District of California is maintained by the Clerk of the Court, James M. Carter & Judith N. Keep United States Courthouse, 333 West Broadway, Suite 420, San Diego, CA 92101.

8. Since 2021, I have been a member in good standing of the bar of the United States District Court for the Central District of California. The roll of members of the bar of the United States District Court for the Central District of

California is maintained by the Clerk of the Court, First Street United States Courthouse, 350 West 1st Street, Suite 4311, Los Angeles, CA 90012.

9. Since 2019, I have been a member in good standing of the bar of the United States Court of Appeals for the Ninth Circuit. The roll of members of the bar of the United States Court of Appeals for the Ninth Circuit is maintained by the Clerk of the Court, P.O. Box 193939, San Francisco, CA 94119-3939.

10. Since 2018, I have been a member in good standing of the bar of the United States Court of Appeals for the Tenth Circuit. The roll of members of the United States Court of Appeals for the Tenth Circuit is maintained by the Clerk of the Court, Byron White Court House, 1823 Stout Street, Denver, CO 80257.

11. No disciplinary proceedings are pending against me in any jurisdiction, and no discipline has previously been imposed upon me in any jurisdiction. Likewise, I have not been subject to suspension or disbarment by any court.

12. If this application to appear *pro hac vice* is granted I agree to:

- a. Pay the Clerk's Fee of \$150.00;
- b. Contribute to the New Jersey Client Security Fund and Ethics Financial Committee such fees as required under L. Civ. R. 101.1(c)(2), which direct that such contributions be made in accordance with New Jersey State Court Rules 1:20-1(b) and 1:28-2;
- c. Abide by the Rules Governing this Court, including but not

limited to L. Civ. R. 101.1(c);

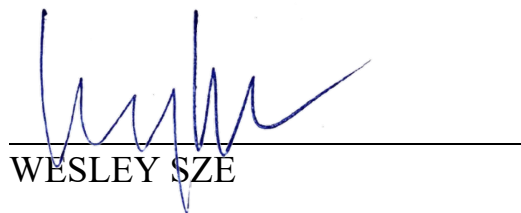
d. Consent to the appointment of the Clerk of the United States District Court for the District of New Jersey as agent upon whom service of process may be made for all actions against me that may arise out of my participation in this matter;

e. Notify the Court immediately of any matter affecting my standing in the Bar of any other court; and

f. Have all pleadings, briefs and other papers filed with the Court signed by Stephanie L. Silvano, or another attorney licensed to practice law in the District of New Jersey from Gibson, Dunn & Crutcher LLP, as the attorney of record for BetMGM, LLC.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Date: May 22, 2023



WESLEY SZE